

**UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF NORTH CAROLINA
ASHEVILLE DIVISION**

SANDRA M. PETERS, on behalf of
herself and all others similarly
situated,

Plaintiff,

v.

AETNA INC., AETNA LIFE
INSURANCE COMPANY, and
OPTUMHEALTH CARE SOLUTIONS,
INC.,

Defendants.

Case No. 1:15-cv-00109-MR

**JOINT NOTICE OF FILING
SUPERSEDING SETTLEMENT
MEMORANDUM FOR ALL
PARTIES**

Plaintiff Sandra Peters on behalf of the Classes (“Plaintiff”) and Defendants Aetna Inc. and Aetna Life Insurance Company (“Aetna”) and OptumHealth Care Solutions, LLC (“Optum,” and together with Plaintiff, the “Parties”) respectfully submit under seal as Exhibit 1 a revised agreement with the material terms of a class settlement (i.e., a “term sheet”) involving all Parties.

After the Parties’ respective submissions on December 6 (Docs. 312-314), the Parties continued their negotiations, and are pleased to report they have reached agreement on material terms to resolve all claims in the case. Exhibit 1 supersedes in full the term sheet filed on December 6, 2024 (Doc. 313).

The Settling Parties now intend to memorialize their settlement in a formal written agreement, and Plaintiff will prepare her motion and legal memorandum seeking preliminary approval of the settlement, as well as a proposed plan of allocation and proposed settlement notice to class members. In light of upcoming commitments of Plaintiff's counsel, as well as the Settling Parties' holiday-related obligations, the Settling Parties request that Plaintiff be given until January 31, 2025 to file such a motion.

The Parties are prepared to address any questions the Court may have.

Respectfully submitted,

Dated: December 17, 2024

/s/ Andrew N. Goldfarb

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EXHIBIT 1

[FILED UNDER SEAL]

CERTIFICATE OF SERVICE

I certify that on December 17, 2024, I caused to be filed and served a copy of the foregoing Notice using the CM/ECF system, which will give notice to counsel of record.

/s/Andrew N. Goldfarb
Andrew N. Goldfarb